



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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CERTIFIED MAIL

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MS Susan Roth
C/O Roth Consulting (representing the POS Terminal 91 PLPs)
6236 27th Avenue NE
Seattle, WA 98115-7114

Dear Ms. Roth:

Re: Environmental Indicator Goals for Your Facility's Corrective Action Efforts

In 1997, the U.S. Environmental Protection Agency (USEPA) selected 27 Washington State hazardous waste storage, treatment, or disposal facilities as high priority sites for corrective action under the Resource Conservation and Recovery Act (RCRA). Your facility, like the other 26, was selected on the basis of its known or potential risk to human health and the environment. The Department of Ecology (Ecology) is contacting all 27 facilities to inform them of the efforts underway to meet two RCRA corrective action goals explained below. Ecology appreciates the time, effort and money your company has spent to address this issue in the past and will spend in the future where corrective action has not yet been completed.

Recently in an effort to encourage progress in corrective action, USEPA established two RCRA environmental indicators (EI). The first indicator, "Current Human Exposures Under Control" (EI code CA 725), is designed to ensure that current threats to human health are quickly controlled. The second indicator, "Migration of Contaminated Groundwater Under Control" (EI Coded CA 750), is to prevent spread of facility-associated contaminants in groundwater. Ecology believes that achieving these intermediate goals will help convince the public that interim steps to prevent current hazards are being taken. While investigations and studies are in progress, we hope that your company shares the view that taking any needed immediate actions demonstrates your commitment to protecting human health and the environment.

Ecology would like to work more closely with you to support your efforts in achieving the goals set by USEPA. Ecology has recently filled in the EI checklists to determine:

- Whether your facility has meet the goals currently (YES), or
- Whether your facility does not meet the goals currently (NO), or
- Whether there is insufficient information (IN) to make a YES or NO determination.

These determinations are public information and are posted on the USEPA web site for public review. To more effectively assist you in achieving these goals, Ecology requests that you review the enclosed two checklists which Ecology has completed or revised recently. We ask that you review these forms for completeness and accuracy. Please pay careful attention to the final conclusions (YES, NO or IN) and whether you have additional information that would lead to different final conclusions. If this is the case, please indicate in writing which sections of the EI forms you believe are inaccurate and include a written justification while citing any appropriate references. I would like to discuss the information with you to determine if a change is warranted. If you wish to fill in your own checklist, blank checklists can also be downloaded from the Region 10, USEPA's web site, given below.

USEPA RCRA



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<http://www.epa.gov/epaoswer/hazwaste/ca/eis.htm> Click on "EI Guidance" for an electronic version of both EI checklists.

To view the current status of your facility, go to:

(<http://yosemite.epa.gov/R10/OWCM.NSF/enforce/CAHomepage>). Click on Region 10 Environmental Indicator Progress and scroll down to the table of facilities showing the EI status.

Please incorporate the results of your self evaluation for EI Codes CA725 and CA750 on the enclosed form (Enclosure A - Schedule for Achievement of GPRA Goals. If your facility has not yet achieved control of human exposure and migration of contaminated groundwater from your facility, then provide a list of your recommended actions and an estimated schedule that will result in a facility-wide CA725 and CA750 "YES" determination. This information will be used to determine if facilities are on track to deal with situations which are a threat to human health and the environment. If your facility has insufficient information (IN) to determine if control of human exposures and migration of contaminated ground water goals are met, please indicate in writing what extra information you believe is lacking, and when the collection of this information could be completed. If Ecology believes that your facility has already achieved control of human exposure and groundwater migration from your facility, and you concur, then you need not fill in the Schedule.)

Please return your schedule and, if appropriate, any written responses and/or your new checklist within sixty (60) days of the date of this letter. Upon receipt of this information by Ecology, I will evaluate the information and may contact you to discuss the schedules for achieving USEPA's cleanup goals. After my review a copy of your response may be sent to USEPA to facilitate an update of information contained on USEPA's website about your facility.

Ecology acknowledges that the questions on EI checklist can be difficult to answer. Environmental conditions seldom pose an obvious current threat to human health, and it generally requires a significant amount of data over an extended period to demonstrate that groundwater plumes have ceased to move. Likewise, there may not be consensus on what constitutes "acceptable levels". Questions concerning this letter and how to interpret the EI should be directed to me at (425) 649-7280 or by email at Gtri461@Ecy.wa.gov. Please submit the requested information to the letterhead address. Thank you very much for your cooperation in this matter.

Sincerely,



Galen H. Tritt
Hazardous Waste & Toxics Reduction Program

GH:jc

Enclosures

cc: W/O enclosures

Julie Sellick, Ecology-NWRO

Jim Knudson, Ecology- HQ

Jan Palumbo, EPA Region X

HZW file 6.2

Enclosure A - Schedule for Achievement of GPRA Goals

Facility Name: Burlington Environmental Pier 91 Facility Location: 2001 West Garfield, Seattle WA	EPA ID # WAD000812917	
Facility-Wide Environmental Indicators. Please indicate the status of the Environmental Indicators on a facility-wide basis by circling the appropriate response in the boxes to the right (yes, no, or IN). If no or IN, provide the projected date the Environmental Indicator will be achieved.	Human Exposures Controlled CA 725 YE - NO - IN	Groundwater Releases Controlled CA 750 YE - NO - IN
Date achieved or projected to be achieved (YY/mm/dd)		